PLAYERS INC

VIA FACSIMILE & FIRST CLASS MAIL

September 11, 2006

Mr. George Gutierrez
CEO and President
AngelCiti Entertainment, Inc.
9000 Sheridan Street, Suite 7
Pembroke Pines, FL 33024

Fax: (954) 337-2919

Re: Unauthorized Use of NFL Players

Dear Mr. Gutierrez:

It has come to our attention that AngelCiti Entertainment, Inc. ("ACEI") through Commerial LT Baroda ("Baroda"), a company controlled by ACEI's executive officers, is advertising BETUS.COM using the images of at least six NFL players. Please be advised that National Football League Players Incorporated ("Players Inc") has the exclusive right to license the names, images, and other identifying characteristics of most NFL players for programs involving six or more NFL players. Any company wishing to utilize such rights must do so under a license from Players Inc.

There is no doubt that your commercial exploitation of Tom Brady, Akili Smith, Chester Taylor, Will Allen, Brent Alexander, Laveranues Coles and others infringes upon the exclusive rights owned by the players and licensed through Players Inc.

We hereby demand that ACEI immediately cause Baroda to cease and desist its use of NFL players in conjunction with BETUS.COM and confirm within five (5) business days from the date of this letter that all such use has ceased. Moreover, Players Inc fully expects to recover compensatory damages for this unauthorized use. Please contact me immediately to discuss such compensation or Players Inc will pursue all legal remedies.

Sincerely,

Joseph A. Nahra
Staff Counsel

cc: Doug Allen
Pat Allen

NATIONAL FOOTBALL LEAGUE PLAYERS INCORPORATED

2021 L STREET, NW, SUITE 500, WASHINGTON, DC 20036 TELEPHONE: 202•496•2860 FAX: 202•296•3486
www.nflplayers.com

Dockets.Justia.com

Confirmation Report – Memory Send

Page : 001
Date & Time: Sep-11-06 12:12pm
Line 1 :
Machine ID :

Job number	:	438
Date	:	Sep-11 12:11pm
To	:	☎19543372919
Number of pages	:	001
Start time	:	Sep-11 12:11pm
End time	:	Sep-11 12:12pm
Pages sent	:	001
Status	:	OK

Job number : 438 *** SEND SUCCESSFUL ***

PLAYERS

VIA FACSIMILE & FIRST CLASS MAIL

September 11, 2006

Mr. George Gutierrez
CEO and President
AngelCiti Entertainment, Inc.
9000 Sheridan Street, Suite 7
Pembroke Pines, FL 33024

Fax: (954) 337-2919

Re: Unauthorized Use of NFL Players

Dear Mr. Gutierrez:

It has come to our attention that AngelCiti Entertainment, Inc. ("ACEI") through Commercial LT Baroda ("Baroda"), a company controlled by ACEI's executive officers, is advertising BETUS.COM using the images of at least six NFL players. Please be advised that National Football League Players Incorporated ("Players Inc") has the exclusive right to license the names, images, and other identifying characteristics of most NFL players for programs involving six or more NFL players. Any company wishing to utilize such rights must do so under a license from Players Inc.

There is no doubt that your commercial exploitation of Tom Brady, Akili Smith, Chester Taylor, Will Allen, Brent Alexander, Laveranues Coles and others infringes upon the exclusive rights owned by the players and licensed through Players Inc.

We hereby demand that ACEI immediately cause Baroda to cease and desist its use of NFL players in conjunction with BETUS.COM and confirm within five (5) business days from the date of this letter that all such use has ceased. Moreover, Players Inc fully expects to recover compensatory damages for this unauthorized use. Please contact me immediately to discuss such compensation or Players Inc will pursue all legal remedies.

Sincerely,

Joseph A. Nahra
Staff Counsel

cc: Doug Allen
Pat Allen

NATIONAL FOOTBALL LEAGUE PLAYERS INCORPORATED
[illegible] L STREET, NW, SUITE [illegible], WASHINGTON, DC [illegible] TELEPHONE: [illegible] FAX: [illegible]
www.nflplayers.com